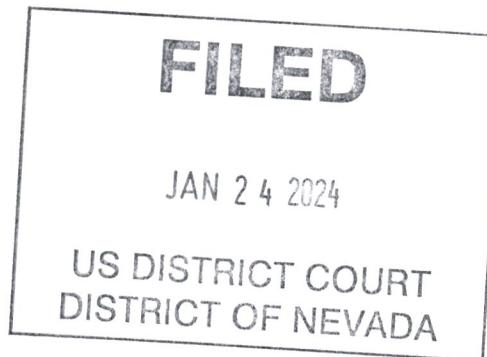


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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

**Case No.** 2:24-mj-00079-NJK

**Plaintiff,**

## **COMPLAINT**

vs.

## VIOLATION:

JULIO ALVAREZ LOPEZ,

Count One  
18 U.S.C. § 113(a)(3) and 49 U.S.C. § 46506  
- Assault with a Dangerous Weapon

BEFORE the United States Magistrate Judge, Las Vegas, Nevada, the undersigned Complainant, being duly sworn, deposes and states:

## COUNT ONE

## (Assault with a Dangerous Weapon)

On or about January 24, 2024, in the Special Aircraft Jurisdiction of the United States,

JULIO ALVAREZ LOPEZ,

defendant herein, did assault C.R. with a dangerous weapon with the intent to do  
bodily harm, all in violation of Title 18, United States Code, Section 113(a)(3) and Title 49  
United States Code, Section 46506.

1 I, Anthony L. Needler, Special Agent with the Federal Bureau of Investigation, being  
2 first duly sworn, hereby depose and state as follows:

3 **INTRODUCTION AND AGENT BACKGROUND**

4 1. I have been a Special Agent with the Federal Bureau of Investigation (FBI)  
5 since February 2020, and in that time, I have worked on the FBI Portland Joint Terrorism  
6 Task Force, FBI Delaware Joint Terrorism Task Force, the FBI Washington Field Office –  
7 Capitol Conspiracy Team, and the FBI Las Vegas Joint Terrorism Task Force, where I am  
8 currently assigned. During my tenure with the FBI, I have gained experience investigating  
9 federal criminal violations including international and domestic terrorism, seditious  
10 conspiracy, civil disorder, drug trafficking, violent crimes against children, and money  
11 laundering. As one of my duties, I am trained as an airport liaison agent and have experience  
12 in investigating federal criminal violations occurring in the special maritime jurisdiction of  
13 the United States. Among other things, I have reviewed records, conducted or participated  
14 in surveillance, written and executed search/arrest warrants, reviewed surveillance footage,  
15 and monitored phone conversations. Prior to being employed with the FBI, I was a United  
16 States Army Officer and investigated violations of the Uniform Code of Military Justice. My  
17 training includes courses at the FBI Academy Basic Field Training at Quantico and courses  
18 on the Uniform Code of Military Justice at Fort Leonard Wood. I am a federal law  
19 enforcement officer within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C),  
20 that is, a government agent engaged in enforcing the criminal laws and duly authorized by  
21 the Attorney General to request a search warrant.

22 2. The facts in this affidavit come from my personal observations, my training  
23 and experience, and information obtained from other agents, witnesses, and agencies. This  
24 affidavit is intended to show merely that there is sufficient probable cause for the requested

1 warrant. It does not set forth all of my knowledge, or the knowledge of others, about this  
2 matter.

3       3. Based on my training and experience and the facts as set forth in this  
4 affidavit, there is probable cause to believe that violations of: 18 U.S.C. § 113(a)(3) and 49  
5 U.S.C. § 46506 (Assault with a dangerous weapon).

6       4. On January 24, 2024, Alaska Airlines Flight 604 departed Seattle-Tacoma  
7 International Airport in SeaTac, Washington, enroute to Harry Reid International Airport  
8 in Las Vegas, NV at approximately 6:10 a.m.

9       5. During the flight, Witness 1 was seated next to defendant JULIO  
10 ALVAREZ LOPEZ. Witness 1 noted that the Defendant was “fidgety” during the flight.  
11 The defendant kept putting his gloves on and off and getting up into his backpack. The  
12 witness stated the defendant would not make eye contact with her.

13       6. Upon initial descent into Las Vegas (approximately 30 minutes before  
14 landing), the defendant got up from his seat and then sat back down, then immediately got  
15 up again. After he stood up the second time, the defendant went to the bathroom. The  
16 witness stated the defendant was gone for a while. Upon returning from the bathroom, the  
17 defendant began punching and hitting the victim, C. R. C.R. was seated across the aisle  
18 from the defendant. During the altercation, the C.R.’s wife was screaming at the  
19 defendant to stop hitting her husband. Witness 1 unbuckled her seatbelt and yelled at the  
20 defendant to stop. At that time, C.R. had stood up. Witness 1 stated there was blood  
21 everywhere. Witness 1 saw the defendant drop something, which appeared to be a pen and  
22 tape bundle. The defendant then started moving up the aisle towards the front of the  
23 aircraft. As the defendant moved up the aisle, he was screaming “I’ll only talk to the FBI.”

1 The defendant was described by Witness 1 as wearing jeans, dark navy gloves, and a dark  
2 jacket.

3       7. C.R.'s wife was struck during the altercation as she shielded her son, who  
4 was approximately 7 years of age.

5                                  Photo: Pen bundle used by the defendant

6       8. As the defendant moved towards the front of the aircraft, C.R., a sworn law  
7 enforcement officer, ordered the defendant to sit down. The defendant did take an empty  
8 seat. At that time, the flight crew worked to provide flex cuffs and the defendant was  
9 restrained for the remainder of the flight. Alaska flight 604 landed at Harry Reid  
10 International Airport in Las Vegas, Nevada, at approximately 8:37 a.m.

11       9. The defendant was taken into custody by the Metropolitan Police  
12 Department (LVMPD) and held at the police substation in Terminal 3 at Harry Reid  
13 International Airport.

14       10. On January 24, 2024, the Task Force Officers of the FBI from the Federal  
15 Air Marshals (FAMs) Service mirandized the defendant in the LVMPD substation located  
16 in Terminal 3. The defendant was willing to talk with the FAMs, but really wanted to  
17 speak with the FBI. The Federal Air Marshals Service attempted an interview, during the  
18 interview, the defendant stated he was seeking asylum in the United States. The defendant  
19 felt the Mafia had been chasing him the last few months. The defendant admitted to never  
20 seeing C.R. before but planned on killing C.R. The defendant armed himself with pens  
21 wrapped in rubber bands. The defendant stated, "I planned on attacking and killing him."

22       11. On January 24, 2024, at approximately 9:46 a.m., the defendant was  
23 interviewed at the LVMPD substation located in Terminal 3 by the responding FBI agents.  
24 During the interview, the defendant admitted to FBI agents that he intended to kill C.R.

1 and had created the weapon he used. The weapon was made by bundling pens with  
2 rubber bands (reference below picture).

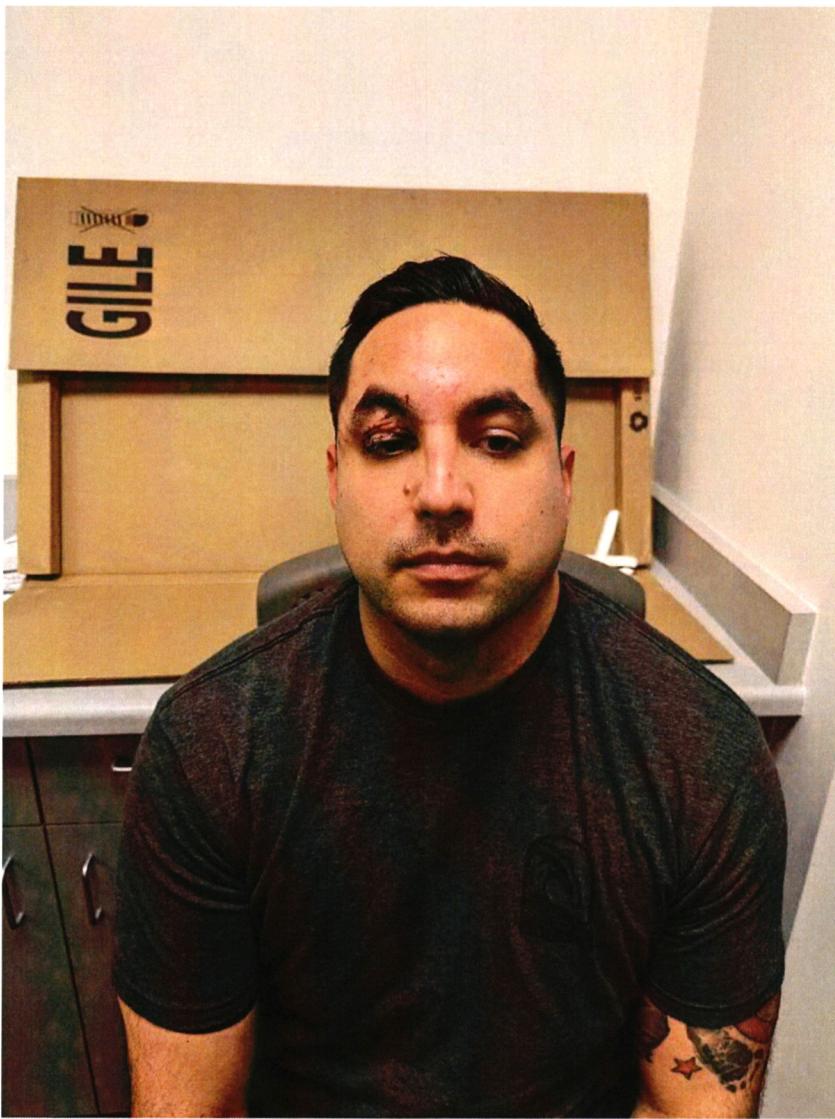


21  
22 12. During the interview, the defendant admitted to making the weapon before  
23 the flight. He saw C.R. on the flight and thought C.R. was following him. The defendant  
24 believed C.R. was the Cartel and the defendant was trying to get C.R. to stop following

1 him. During the interview, the defendant admitted to the FBI agents that he was trying to  
2 stab C.R. in the eye to reach C.R.'s brain to kill him.

3 13. Your affiant observed significant injuries around the eye of C.R.. Pictures of  
4 C.R. are below.

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6  
7 Picture 1 of C.R.  
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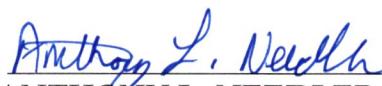




14. On January 24, 2024, a task force officer with the Southern Nevada  
22 Counterterrorism Center interviewed Witness 2. Witness 2 stated that he had removed his  
23 headphones and was awaiting arrival in Las Vegas, when he heard yelling and what he  
24

1 described as a commotion several rows behind him. Witness 2 stated he stood up from his  
2 seat and saw an approximately 40 year old male adult, with gray/white hair tied in a bun  
3 on the top of his head, wearing a sweatshirt and dark pants stabbing another passenger  
4 with an unknown object. After the defendant stopped stabbing the other passenger, the  
5 defendant began walking towards the front of the aircraft. While the defendant was  
6 walking towards the front of the aircraft, Witness 2 observed the defendant drop the item in  
7 which the defendant was stabbing the victim. Witness 2 described the weapon used as  
8 several pens wrapped together. The defendant passed the row of Witness 2 and took an  
9 empty seat a few rows in front of Witness 2. The defendant was restrained by the wrists  
10 for the remainder fo the flight.

11       15. Your affiant submits there is also probable cause to believe that defendant,  
12 JULIO ALVAREZ LOPEZ, violated 18 U.S.C. § 113(a)(3) and 49 U.S.C. § 46506 which  
13 makes it a crime to assault another with a dangerous weapon, with intent to do bodily  
14 harm.

15   
16 ANTHONY L. NEEDLER  
17 SPECIAL AGENT, FBI

18 SUBSCRIBED and SWORN to before me  
19 this 24th day of January 2024.

20   
21 NANCY J. KOPPE  
22 U.S. MAGISTRATE JUDGE